

405.130 NRCS Ethics Training Plan

August 2002 – December 2004

Required Ethics Training for New Entrants

1) Supervisors will:

- a) Ensure each new entrant familiarizes him or herself with the following three documents, and takes the listed training on the USDA Ethics Web site at <http://www.usda-ethics.net>.
- b) Allow each new entrant a minimum of 1 hour of official time to complete these requirements within the first 30 calendar days on duty.
- c) Provide new entrants with the name, telephone number, and e-mail address of their servicing NRCS certified ethics advisor. Supervisors must ensure that the person so designated is an NRCS certified ethics advisor.
- d) Provide each new entrant a copy of this plan.

2) New entrants will:

- a) Review the following documents and have their questions answered by a qualified ethics advisor.
 - i) [Standards of Ethical Conduct \(OGE Regulations\)](#)
5 CFR Part 2635 subparts A through I
 - ii) [USDA Supplemental Ethics Regulation](#)
5 CFR Part 8301
 - iii) [Employee Responsibilities and Conduct](#)
OHRM Personnel Bulletin 735-1
- b) At a minimum, complete the following training modules on the USDA Ethics Web site:
 - i) [Conflicting Interests](#)
 - ii) [Gifts from Outside Sources](#)
 - iii) [Participation in Outside Organizations](#)
- c) Become familiarized with the other training module topics, and complete modules, as needed, to understand and comply with the Standards of Ethical Conduct for Employees of the Executive Branch (5 CFR Part 2635), USDA Supplemental Ethics Regulations, and USDA Employee Responsibilities and Conduct Regulations.
- d) Note the following information about key USDA/NRCS Ethics Officials.

The Ethics Officials for USDA/NRCS are:

- 1) The Designated Agency Ethics Official (DAEO) for USDA is John C. Surina, Acting Assistant Secretary for Administration. Raymond J. Sheehan, Director, USDA Office of Ethics, is the Alternate Designated Agency Ethics Official.
- 2) The Deputy Chief for Management is the Chief Ethics Official for NRCS [or Deputy Ethics Official (DEO)]. Regional Conservationists are Deputy DEO's. [USDA Ethics Issuance 02-2, Delegations](#), prohibits further re-delegation of this authority. An employee may obtain a formal ethics opinion from NRCS by writing to the Deputy Chief for Management.
- 3) The Agency Ethics Advisor is Caryl J. Butcher. Ms. Butcher can be contacted at (301) 504-2197 or by e-mail at caryl.butcher@usda.gov.

Required Annual Ethics Training

Supervisors will ensure that all employees complete ethics training by December 15, annually, by completing, at a minimum, at least three of the training modules on the USDA Ethics Web site at <http://www.nrcs.usda.gov/intranet/ethics/>. This task can be accomplished either individually, or through a group session facilitated by a certified NRCS ethics advisor with current expertise in the topic(s) being taught. Employees must document their own completion of required ethics training, as explained below.

Documentation of Completed Training

Employees required to complete ethics training must insure they receive credit for completed training in EthTrack. EthTrack is USDA's system for recording and tracking completed ethics training. When training is completed on the USDA Ethics Web site at <http://www.usda-ethics.net/>, you will be prompted to enter your social security number and e-mail address to record the accomplishment in EthTrack. EthTrack is integrated with your records at the National Finance Center. Credit for other completed ethics training, including in-person ethics courses, must be entered manually by the servicing ethics advisor. Employees who receive in-person ethics training are responsible for providing the following information to their servicing ethics advisor: name of the presenter, date and time (length of the session), and topic(s) covered.

Public Financial Disclosure Report Filers

Employees who have been notified by the USDA Office of Ethics that they are required to submit a public financial disclosure statement (Office of Government Ethics (OGE) Form 278) must complete required ethics training by November 1.

Confidential Financial Disclosure Report Filers

Employees who have been notified by their administrative office that they must submit a confidential financial disclosure statement, (Office of Government Ethics (OGE) Form 450), must complete required ethics training by December 1.

All Other Employees

Most NRCS employees will only need to complete ethics training in the following calendar years: CY 2000, CY 2003, CY 2006, CY 2009, etc. However, a supervisor may require employees to document completion of this requirement on a more frequent basis to address specific training needs or actual or potential problem areas.

Required Ethics Training for New and Continuing NRCS Ethics Advisors

- 1) NRCS certified ethics advisors are to ensure advice and guidance is consistent with 18 U.S.C. 201 – 209, and 5 C.F.R. Part 2635.

Initial certification requires completion of the following training modules on the USDA Ethics Web site at <http://www.usda-ethics.net> and elements 2, 3, and 4, below:

[Conflicting Interests](#)
[Gifts from Outside Sources](#)
[Gifts Between Employees](#)
[Invitations from Outside Entities](#)
[Acceptance of Payment from a Non-Federal Source for Travel Expenses](#)
[Participation in Outside Organizations](#)
[Using Government Property and Time](#)

- 2) Read the conflict of interest statutes at 18 USC 201 – 209. Give specific attention to 208. Also, become familiar with key elements of the representational prohibitions by reviewing the summary of 203 and 205 in the [USDA Ethics Advisors Desk Reference](#) on the USDA Ethics Website.
- 3) Read and understand the Standards of Ethical Conduct for Employees of the Executive Branch at 5 CFR Part 2635 subparts A through I. During initial training, contact the Agency Ethics Advisor directly to have your questions answered.
- 4) Understand USDA Ethics Issuances. To date, these include:
 - a. USDA Supplemental Ethics Regulation, 5 CFR Part 8301
 - b. 99-2 Acceptance of Travel from Non-Federal Sources
 - c. Participation in Non-Federal Organizations

The remaining elements of the training plan are to be completed within 30 calendar days of initial certification, or the certification is cancelled and the employee must cease providing ethics advice until the training plan is completed:

- 5) Complete the remaining training modules on the USDA Ethics Web site.
- 6) As new USDA ethics training modules become available, complete each within 30 calendar days.
- 7) Access and know how to use the USDA Ethics Desk Reference.
- 8) In addition, regional ethics advisors and the advisor(s) for the National Business Management Center need to access and use the Office of Government Ethics' [Form 450 Review Guide](#).

In addition, NRCS ethics advisors are to:

- 9) Be familiar with and act consistent with the NRCS Ethics Delegations of Authority at http://policy.nrcs.usda.gov/scripts/lpsiis.dll/GM/GM_130_400_B_11.htm.
- 10) Be familiar with the requirements for training New Entrants.
- 11) Know and correctly identify the ethics officials for USDA and NRCS. (See the plan for training New Entrants, above.)